

original

Bridge Manor

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

v. :

SAM NING SON CHIANG, :

Defendant. :

- - - - -x

07CRIM. 673

07CRIM. 6723

07 Cr.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: JUL 28 2007

COUNT ONE

The United States Attorney charges:

1. From at least in or about January 2004, through and including in or about June 2004, in the Southern District of New York and elsewhere, SAM NING SON CHIANG, the defendant, and others known and unknown, unlawfully, willfully and knowingly, did combine, conspire, confederate and agree together and with each other to violate Title 8, United States Code, Section 1325(c).

2. It was a part and an object of the conspiracy that SAM NING SON CHIANG, the defendant, and others known and unknown, unlawfully, willfully and knowingly, would and did enter into a marriage for the purpose of evading provisions of the immigration laws, in violation of Title 8, United States Code, Section 1325(c).

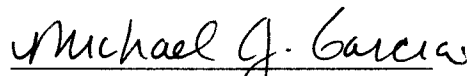
Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and

elsewhere:

- a. In or about January 2004, SAM NING SON CHIANG, the defendant, received an initial partial payment of \$5,000 from a co-conspirator not named as a defendant herein ("CC-1") to enter into a fraudulent marriage with another co-conspirator, a female Chinese national, not named as a defendant herein ("CC-2");
- b. On or about January 12, 2004, CHIANG traveled to China;
- c. On or about January 15, 2004, CHIANG entered into a fraudulent marriage with CC-2 in Fujian Province, China; and
- d. CHIANG received an additional \$5,000 from CC-1 for having entered into the fraudulent marriage with CC-2.

(Title 18, United States Code, Section 371.)


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES

-v-

SAM NING SON CHIANG

INFORMATION

MICHAEL J. GARCIA
United States Attorney.

18 U.S.C. 371

7/24/07
18

Pl. Inf & Waiver of Def. Ausa, Josh
Klein pres. Def. Sam Chang pres. w/ father
Langue, F. tell. Marydawn Intep pres. Consent
to Record Def. Mary Phil. Def. Peter Gilly to
Inf. Barl Cont.

Mary T. Johnson